

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE:

MAR 09 1992

SUBJECT: Comments on American Chemical Services final-draft
Baseline Risk AssessmentFROM: Pat Van Leeuwen, Toxicologist *PV*
Technical Support UnitTO: Wade Hartwick
Remedial Project Manager

In response to your questions about finalizing the Baseline Risk Assessment for the American Chemical Services site, these are my comments:

1) Concerning the unaddressed comments from the December 10, 1991 review, I can live with eight significant digits for the exposure point concentrations even though it is misleading to imply such accuracy in the data. Likewise, the 200 mg/day soil ingestion rate for trespassers aged 5-15 years old can be tolerated. We have noted that EPA considers this value to be overly conservative, so we have not imposed this parameter value on the contractors. It is their own choice to present a more conservative assessment, and I suspect they are not willing to change all the calculations at this point.

2) Concerning the conclusions on the Griffith Municipal Landfill, my comments of August 1, 1991 were addressed in that the contractors did apply a second model to assess the potential for groundwater contamination, and they used a "no action" scenario - i.e., they assumed that the current cap is not upgraded. I think this model was reviewed by one of our hydrogeologists, who would be better able to tell you if the model was applied correctly and the assumptions and parameter values were correct. In addition, I believe you said at the time of review that we need not worry about the Landfill as it would be addressed under the State of Indiana regulations. If you feel comfortable about the handling of the Landfill, I have no further objections.

3) About the question of official approval for the Baseline Risk Assessment, it is not a requirement in Region V. My function is to provide comments as an in-house technical consultant for your use. If you feel that they have been addressed to your satisfaction, you can go ahead with the preparation of the ROD.